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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on
behalf of all others similarly situated;

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota
corporation; Stavatti Aerospace, Ltd, a
Wyoming corporation; Stavatti
Corporation, a Minnesota corporation;
Stavatti Immobiliare, Ltd, a Wyoming
corporation; Stavatti Industries, Ltd, a
Wyoming corporation; Stavatti Niagara,
Ltd., a New York corporation; Stavatti
Super Fulcrum, Ltd, a Wyoming
corporation; Stavatti Ukraine, a Ukrainian
business entity; Stavatti Heavy Industries
Ltd, a Hawaii corporation; Christopher
Beskar and Maja Beskar, husband and
wife; Brian Colvin and Corrina Colvin,
husband and wife; John Simon and Jean
Simon, husband and wife; William Mcewn
and Patricia Mcewen, husband wife; Rudy
Chacon and Jane Doe Chacon, husband
and wife; and DOES 1 through 10,
inclusive,

Defendants.

Case No. CV-23-00226-PHX-DJH

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR ENTRY
OF DEFAULT JUDGMENT AGAINST
DEFENDANTS STAVATTI
AEROSPACE, LTD, A WYOMING
CORPORATION; STAVATTI
IMMOBILIARE, LTD, A WYOMING
CORPORATION; STAVATTI
INDUSTRIES, LTD, A WYOMING
CORPORATION; STAVATTI SUPER
FULCRUM LTD, A WYOMING
CORPORATION; STAVATTI HEAVY
INDUSTRIES LTD, A HAWAII
CORPORATION; STAVATTI
NIAGARA LTD, A NEW YORK
CORPORATION; AND JOHN SIMON**

1 Plaintiff Valentino Dimitrov (“Plaintiff”) requested a default judgment against
2 Defendants John Simon; Stavatti Niagara, Ltd.; Stavatti Aerospace, Ltd.; Stavatti Heavy
3 Industries, Ltd.; Stavatti Immobiliare, Ltd.; Stavatti Industries, Ltd.; and Stavatti Super
4 Fulcrum, Ltd. (collectively, “Defendants”). The Clerk of the Court entered the
5 Defendants’ default pursuant to Fed. R. Civ. P. 55(a). The Court, having examined the
6 pleadings and the record, and for good cause appearing, finds that the Plaintiff’s request
7 is well-founded and should be granted.

8 **IT IS THEREFORE ORDERED** that Plaintiff is awarded judgment against
9 Defendants John Simon; Stavatti Niagara, Ltd.; Stavatti Aerospace, Ltd.; Stavatti Heavy
10 Industries, Ltd.; Stavatti Immobiliare, Ltd.; Stavatti Industries, Ltd.; and Stavatti Super
11 Fulcrum, Ltd. as follows:

- 12 A. For an award of Plaintiff’s breach of contract damages of \$6,000,000 for which
13 Defendants John Simon; Stavatti Niagara, Ltd.; Stavatti Aerospace, Ltd.;
14 Stavatti Heavy Industries, Ltd.; Stavatti Immobiliare, Ltd.; Stavatti Industries,
15 Ltd.; and Stavatti Super Fulcrum, Ltd. shall be jointly and severally liable;
16 B. For Plaintiff’s attorneys’ fees and costs, a motion for attorneys’ fees and costs
17 will be filed pursuant to LRCiv 54.2;
18 C. For post judgment interest on the above amounts at a rate of ____% per
19 annum; and
20 D. For Plaintiff’s attorneys’ fees and costs incurred in enforcing this judgment.

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22 **DATED** this ____ day of April 2023.
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